

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEBRA HESLOP,

Defendant.

No. 2:20-cv-1736

**COMPLAINT**

Plaintiff, the United States of America, by and through its undersigned attorneys, brings this complaint against Defendant DEBRA HESLOP, and alleges the following:

**I. NATURE OF THIS ACTION**

1. Starting as early as July 2016 and continuing to the present, Defendant has conducted financial transactions with large sums of illegally obtained money, knowing that her transactions are designed to conceal the nature, source, location, ownership, and control of proceeds. Defendant's conduct includes knowingly receiving money obtained via fraud and then immediately transmitting the same money to accomplices. Defendant has transmitted money to and from accomplices in Nigeria, South Africa, and the United States.

2. The United States seeks to prevent continuing and substantial injury to the United States and victims by bringing this action for a permanent injunction and other equitable relief under 18 U.S.C. § 1345. The United States seeks to enjoin the ongoing commission of banking law violations as defined in 18 U.S.C. § 3322(d), including money laundering in violation of 18 U.S.C. § 1956(a)(1)(B), international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B), and structuring cash transactions to evade transaction reporting requirements in violation of 31 U.S.C. § 5324(a).

## II. JURISDICTION AND VENUE

3. This Court has jurisdiction over this action under 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

4. The United States District Court for the Western District of Washington is a proper venue for this action under 28 U.S.C. § 1391(b)(1) & (b)(2) because Defendant is a resident of this District and because a substantial part of the events or omissions giving rise to this Complaint occurred in this District.

## III. PARTIES

5. Plaintiff is the United States.

6. Defendant Debra Heslop is a resident of this District, residing in Renton, Washington. In connection with the matters alleged herein, Defendant transacts and has transacted business in this District.

## IV. FACTS

### A. Defendant's Ongoing Banking Law Violations

7. Defendant conducts financial transactions to benefit one or more international fraud schemes, knowing that the moneys she receives and transmits are obtained fraudulently,

1 knowing that her transactions are designed to conceal the schemes, and structuring her cash  
2 transactions in an effort to prevent the filing of required financial transaction reports.

3 Defendant receives financial compensation for this conduct, by transmitting to an accomplice  
4 slightly smaller amounts than she receives and keeping the difference for herself.

5 **(I) Money laundering and international money laundering**

6 8. Beginning at least as early as 2016, Defendant has knowingly and willingly  
7 accepted hundreds of thousands of dollars from multiple sources and then transmitted most of  
8 that money to accomplices, including to locations outside the United States, such as Nigeria or  
9 South Africa.

10 9. Defendant became a victim of different internet fraud schemes in 2013 and  
11 2014. After that time period, she began accepting money orders and other deposits from a  
12 variety of sources and then transferring much of that money to other individuals outside the  
13 United States, through money orders and other financial transactions.

14 10. Between 2016 and 2017, U.S. Bank reported that Defendant received multiple  
15 deposits from numerous out-of-state sources that had no identifiable relationship with the  
16 Defendant and then Defendant would make rapid cash or wire transfer withdrawals to different  
17 individuals in the United States, South Africa, and Nigeria. The total amount involved was  
18 approximately \$70,360. U.S. Bank closed Defendant's account in April 2017.

19 11. Between June 2016 and August 2016, Defendant loaded approximately \$19,770  
20 on Reloadit and other prepaid credit cards. Those funds were then withdrawn across multiple  
21 ATM locations in South Africa.

22 12. Between October 13, 2017 and March 20, 2018, Defendant made a total of 19  
23 wire transfers from two different Walmart locations in Renton and Bellevue. These transfers  
totaled approximately \$30,544 to a variety of payees in the United States. The average

1 transaction amount was approximately \$1,607 and appeared to be designed to avoid the \$3,000  
2 Bank Secrecy Act recordkeeping threshold.

3 13. Between November 19, 2018 and February 27, 2019, Defendant made a series  
4 of rapid movement transactions involving her Wells Fargo checking account, using cashier  
5 check deposits, peer-to-peer credits, domestic wire transfers followed by cash withdrawals,  
6 outgoing wire transfers, and international debit card withdrawals, involving a total of  
7 approximately \$27,685.

8 14. Between May 20, 2019 and May 31, 2019, Defendant caused two wire transfers  
9 in the amount of \$4,000 and \$4,500 to be made to another person known to be involved with  
10 certain internet fraud schemes.

11 15. Between July 1, 2019 and August 8, 2019, Defendant's JP Morgan Chase  
12 account received multiple electronic wire transfers from suspicious sources for a total of  
13 approximately \$189,377. During this same period, multiple electronic withdrawals were made  
14 from the same account for a total of \$185,992.76 to multiple different beneficiaries with no  
15 identifiable relationship to Defendant.

16 16. On or about October 25, 2019, SunTrust Bank reported that Defendant had an  
17 unauthorized electronic ACH transfer credited for approximately \$416,227. SunTrust closed  
18 Defendant's account because of the suspicious nature of the activity.

19 17. Between February 27, 2020 and May 29, 2020, Defendant received a number of  
20 wire transfers. Following these credits, 49 cash withdrawals were made from Defendant's  
21 account for a total of approximately \$11,115. The withdrawals ranged in amounts from \$20 to  
22 \$1,005 and were conducted at Wells Fargo ATM and branch locations in Connecticut and non-  
23

1 Wells Fargo ATM locations in South Africa. There were 28 additional debit card withdrawals  
2 for a total of approximately \$21,027 through WorldRemit transfers.

3 **(2) Structuring**

4 18. Defendant engaged in conduct designed to cause domestic financial institutions  
5 to fail to file a report required under 31 U.S.C. § 5313(a), and the regulations promulgated  
6 thereunder. Defendant repeatedly caused and attempted to cause her cash withdrawals, and  
7 those of her relative, to be structured in amounts designed to avoid this transaction reporting  
8 requirement.

9 19. Defendant repeatedly sent a high volume of structured wire transfers. For  
10 example, between April 26, 2020, and May 19, 2020, Defendant purchased eight different  
11 money orders from Western Union at a Fred Meyer location in Renton, Washington, each one  
12 for a total of \$4,500 in order to structure the payments and avoid reporting requirements.

13 20. For further example, between October 13, 2017 and March 20, 2018, Defendant  
14 made 19 wire transfers from two different Walmart locations in Renton and Bellevue for a total  
15 of approximately \$30,544; the average transaction amount was approximately \$1,607.

16 **B. Defendant's Knowledge of Fraud; Intent to Conceal the Nature, Source, Location,**  
17 **Ownership, or Control of Proceeds; and Intent to Evade Transaction Reporting**  
18 **Requirements**

19 21. On information and belief, Defendant has engaged in the financial transactions  
20 alleged in Paragraphs 7 through 20 with the knowledge that the moneys she receives from and  
21 transmits to accomplices are obtained by fraud schemes or other specified unlawful activity.

22 22. On information and belief, Defendant has engaged in the financial transactions  
23 alleged in Paragraphs 7 through 20 with the intent to conceal the nature, source, location,  
ownership, or control of proceeds.

1           23.     On information and belief, Defendant has engaged in the financial transactions  
2     alleged in Paragraphs 18 through 20 with the intent to evade transaction reporting requirements.

3                               **C. Harm to the United States**

4           24.     The United States is suffering continuing and substantial injury from  
5     Defendant's banking law violations.

6           25.     Defendant is continuing to facilitate her banking law violations. Absent  
7     injunctive relief by this Court, Defendant will continue to cause continuing and substantial  
8     injury to the United States and victims.

9                               **COUNT I**  
10                              **(18 U.S.C. § 1345 – Injunctive Relief)**

11           26.     The United States re-alleges and incorporates by reference Paragraphs 1 through  
12     28 of this Complaint as though fully set forth herein.

13           27.     By reason of the conduct described herein, Defendant has committed, is  
14     committing, and is about to commit banking law violations as defined in 18 U.S.C. § 3322(d),  
15     including money laundering with intent to conceal in violation of 18 U.S.C. § 1956(a)(1)(B)(i),  
16     money laundering with intent to evade transaction reporting requirements in violation of  
17     18 U.S.C. § 1956(a)(1)(B)(ii), international money laundering with intent to conceal in  
18     violation of 18 U.S.C. § 1956(a)(2)(B)(i), international money laundering with intent to evade  
19     transaction reporting requirements in violation of 18 U.S.C. § 1956(a)(2)(B)(ii), and structuring  
20     cash transactions to evade transaction reporting requirements in violation of 31 U.S.C. § 5324.

21           28.     Because Defendant is committing or about to commit banking law violations as  
22     defined in 18 U.S.C. § 3322(d), the United States is entitled, under 18 U.S.C. § 1345, to seek a  
23     permanent injunction restraining all future banking law violations and any other action that this  
   Court deems just to prevent a continuing and substantial injury to the United States.

29. As a result of the foregoing, Defendant's conduct should be enjoined pursuant to 18 U.S.C. § 1345.

### VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff, United States of America, requests of the Court the following relief:

A. That the Court issue a permanent injunction, pursuant to 18 U.S.C. § 1345, ordering that Defendant is restrained from engaging, participating, or assisting in money laundering, international money laundering, structuring transactions to evade transaction reporting requirements, and any money transmitting business; and

B. That the Court order such other and further relief as the Court shall deem just and proper.

Respectfully submitted this 24th day of November, 2020.

BRIAN T. MORAN  
United States Attorney

s/ Nickolas Bohl  
NICKOLAS BOHL, WSBA #48978  
Assistant United States Attorney  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4067  
Email: [nickolas.bohl@usdoj.gov](mailto:nickolas.bohl@usdoj.gov)

Counsel for United States of America


CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Western District of Washington and is the person of such age and discretion as to be competent to serve papers;

It is further certified that on this day, I mailed by United States Postal Service said pleading to Defendant, addressed as follows:

Debra Heslop  
774 Queen Ave. NE  
Renton, WA 98056-3871

Dated this 24th day of November, 2020.

  
\_\_\_\_\_  
Julene Delo, Legal Assistant  
United States Attorney's Office  
700 Stewart St., Ste. 5220  
Seattle, WA 98101  
Phone: 253-428-3800  
Fax: 253-428-3826  
E-mail: [julene.delo@usdoj.gov](mailto:julene.delo@usdoj.gov)



**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
AUSA Nickolas Bohl, United States Attorney's Office  
700 Stewart Street, Suite 5220, Seattle, WA 98101,  
206-553-7970

**DEFENDANTS**

DEBRA HESLOP

County of Residence of First Listed Defendant King  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 U.S.C. § 1345  
Brief description of cause:  
Injunction for structuring, money laundering, fraud

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** \_\_\_\_\_ **CHECK YES only if demanded in complaint:**  
**JURY DEMAND:** ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE 11/24/2020 SIGNATURE OF ATTORNEY OF RECORD s/ Nickolas Bohl

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEBRA HESLOP

Defendant.

NO. \_\_\_\_\_

**[PROPOSED] CONSENT DECREE AND  
FINAL JUDGMENT**

**CONSENT DECREE AND FINAL JUDGMENT**

Plaintiff, United States of America ("Plaintiff"), commenced the above-captioned action in this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Debra Heslop, is committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).

Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff's allegations without litigation and jointly request and consent to the entry of this Consent Decree and Final Judgment ("Consent Decree") without Defendant's admission of liability or wrongdoing. Defendant agrees to waive service of the Summons and the Complaint.

1 Defendant has entered into this Consent Decree freely and without coercion. Defendant  
2 further acknowledges that she has read the provisions of this Consent Decree, understands them,  
3 and is prepared to abide by them.

4 **IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:**

5 1. This Court has jurisdiction over this matter and the parties pursuant to  
6 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under  
7 28 U.S.C. § 1391(b) and (c).

8 2. Defendant neither admits nor denies the allegations in the Complaint. Only for  
9 purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

10 3. For purposes of this Consent Decree:

11 a. “Defendant” means Debra Heslop.

12 b. “Person” means an individual, a corporation, a partnership, or any other  
13 entity.

14 c. “Funds” include any currency, check, money order, stored value card,  
15 stored value card numbers, bank wire transmission, or other monetary value.

16 d. “Money transmitting business” refers to a person who, for a fee, receives  
17 funds from one person for the purpose of transmitting the funds, or providing access to the  
18 funds, to another person.

19 e. “Fee” refers to a payment or compensation of any kind regardless of how  
20 the payment or compensation is labeled, including but not limited to processing fees,  
21 service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and  
22 gratuities.  
23

1       4.       Upon entry of this Decree, Defendant is permanently prohibited and enjoined  
2 from, directly or indirectly, assisting, facilitating, or participating in any money transmitting  
3 business.

4       5.       Within five (5) days after entry of this Consent Decree, the Defendant is ordered  
5 to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent  
6 Decree sworn under penalty of perjury. The statement shall be addressed to:

7               U.S. Postal Inspector Amy Kerkof  
8               U.S. Postal Inspection Service  
9               P.O. Box 400  
              Seattle, WA 98111  
              206-442-6132 (desk)

10       6.       The Consent Decree shall not be modified except in writing by Plaintiff and the  
11 Defendant and approved by the Court.

12       7.       This Consent Decree shall constitute a final judgment and order in this action.

13       8.       This Court retains jurisdiction of this action for the purpose of enforcing or  
14 modifying this Consent Decree and for the purpose of granting such additional relief as may be  
15 necessary or appropriate.

16  
17       **DONE AND ORDERED** in Chambers at Seattle, Washington, this \_\_\_\_\_ day of

18 \_\_\_\_\_, 2020.  
19  
20  
21  
22  
23

**APPROVED AND ENTERED BY THIS COURT**

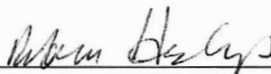
Dated this \_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
HONORABLE \_\_\_\_\_  
United States District Judge

We hereby consent to the entry of the foregoing Decree:

**FOR DEFENDANT DEBRA HESLOP**

Dated: NOV 5, 2020

  
DEBRA HESLOP

**FOR PLAINTIFF THE UNITED STATES OF AMERICA**

BRIAN MORAN  
United States Attorney

Dated: November 24, 2020

By: s/ Nickolas Bohl  
NICKOLAS BOHL, WA #48978  
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